

Exhibit I

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
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**ADAMS PLAINTIFFS’
STATEMENT OF ISSUES AND DESIGNATION OF RECORD ON APPEAL**

By and through the undersigned counsel, Hilliard Muñoz Gonzales LLP and Thomas J. Henry Injury Attorneys – counsel to the *Adams* Plaintiffs –submit this Statement of Issues and Designation of Record on Appeal pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure with respect to their appeal from the *Judgment*, dated December 4, 2015 (ECF No. 13563) (the “**Judgment**”) and *Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues*, dated November 9, 2015 (ECF No. 13533) (the “**Decision**”),¹ and respectfully state as follows:

¹ Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Decision.

STATEMENT OF ISSUES

This appeal by the *Adams* Plaintiffs addresses the following issues:

1. Did the Bankruptcy Court err in Paragraph 24 of the Judgment in holding that “[c]laims that allege that New GM is liable in connection with vehicle owners’ failure to file proofs of claim in the Old GM bankruptcy case are barred and enjoined by the Sale Order, April Decision and June Judgment, and shall not be asserted against New GM”?
2. Did the Bankruptcy Court err in determining that the *Adams* Plaintiffs’ compliant did not state an Independent Claim against New GM?
3. Did the Bankruptcy Court abuse its discretion in barring and enjoining the *Adams* Plaintiffs from pursuing their complaint against New GM without leave to amend?

DESIGNATED ITEMS

The *Adams* Plaintiffs hereby designate the following items for inclusion in the record on appeal (i) items 1 through 7 designated in the Appellants' Statement of Issues on Appeal and Designation of Items to Be Included in the Record on Appeal [ECF No. 13576], filed by the Ignition Switch Plaintiffs on December 28, 2015, and (ii) the following items (including any exhibit, annex, or addendum thereto):

<u>Description</u>	<u>Filing Date</u>	<u>Docket No.</u>
1. Decision on Motion to Enforce Sale Order	4/15/2015	13109
2. Judgment	6/1/2015	13177
3. Decision and Order on Bledsoe Plaintiffs' Reargument and Other Post-Judgment Motions	7/22/2015	13313
4. Adams Plaintiffs' No Dismissal Pleading	8/11/2015	13359
5. Response By General Motors LLC to Adams Plaintiffs' No Dismissal Pleading	9/3/2015	13422
6. Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues	11/9/2015	13533
7. Judgment	12/4/2015	13563

Dated: December 30, 2015

Respectfully submitted,

/s/ William P. Weintraub

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: :
MOTORS LIQUIDATION COMPANY, *et al.*, : No. 09-50026 (REG)
f/k/a GENERAL MOTORS CORP., *et al.*, :
: (Jointly Administered)
Debtors. :
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**APPELLANTS' STATEMENT OF THE ISSUES ON APPEAL AND
DESIGNATION OF THE ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, Appellants, the Ignition Switch Plaintiffs,¹ respectfully submit the following: (i) statement of the issues to be presented on appeal from the *Decision on Imputation, Punitive Damages, and Other No-Strike*

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Judgment. As defined in the Judgement, "Ignition Switch Plaintiffs" shall mean plaintiffs that have commenced a lawsuit against New GM asserting economic losses based on or apprising from the Ignition Switch in the Subject Vehicles (each term as defined in the *Agreed and Disputed Stipulations of Fact Pursuant to the Court's Supplemental Scheduling Order*, dated July 11, 2014, filed August 8, 2014 (ECF No. 12826), at 3).

and No-Dismissal Pleadings Issues, dated November 9, 2015 (ECF No. 13533, as corrected ECF No. 13534) (the “**Decision**”) and the *Judgment*, dated December 4, 2015 (ECF No. 13563) (the “**Judgment**”); and (ii) designation of the items to be included in the record on appeal.

I. Statement Of The Issues To Be Presented On Appeal

Appellants submit the following statement of issues to be presented on appeal:

1. Did the Bankruptcy Court err in holding that “[c]laims that allege that New GM is liable in connection with vehicle owners’ failure to file proofs of claim in the Old GM bankruptcy case are barred and enjoined by the Sale Order, April Decision and June Judgment, and shall not be asserted against New GM” under Paragraph 24 of the Judgment?

II. Designation Of The Items To Be Included In The Record On Appeal

Appellants submit the following designation of items to be included in the record on appeal (including any exhibit, annex, or addendum thereto):

Item No.	Document	Filing Date	ECF No.
1	Motion for Sale of Property under Section 363(b)/Debtors’ Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing	6/1/2009	92
2	Notice of Filing of the Amended Master Sale and Purchase Agreement and Certain Exhibits of the Disclosure Schedule Thereto	6/27/2009	2649
3	Order (I) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief	7/5/2009	2968

Item No.	Document	Filing Date	ECF No.
4	Errata Order Regarding Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of Related Executory Contracts; and (3) Entry Into UAW Retiree Settlement Agreement	7/6/2009	2985
5	Order Establishing the Deadline For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	9/16/2009	4079
6	Certificate of Publication of the Notice of Deadlines For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code (the General Notice) and the Notice of Deadline for Filing Proofs of Claim (the Local Notice))	1/5/2010	4724
7	Affidavit of Publication of Notice of Deadlines for Filing Certain Proofs of Claim	1/25/2010	4877

Dated: December 28, 2015

Respectfully submitted,

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/s/ Steve W. Berman

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*Counsel for Ignition Switch Plaintiffs and
Designated Counsel for Ignition Switch Plaintiffs in
the Bankruptcy Court*

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2015, I caused the Notice of Appeal to be filed and served upon all parties receiving notice via the Court's ECF system.

Dated: December 28, 2015

/s/ Steve W. Berman

Steve W. Berman (*pro hac vice*)

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Tina Farmer, Momoh Kanu, Tynesia Mitchell,
Dierra Thomas, James Tibbs and Ishmail Sesay*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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)	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,)	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,)	
)	
Debtors.)	(Jointly Administered)

**APPELLANTS' STATEMENT OF THE ISSUES ON APPEAL AND DESIGNATION OF
THE ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, Appellants Sharon Bledsoe, Celestine Elliott, Lawrence Elliott, Tina Farmer, Momoh Kanu, Tynesia Mitchell, Dierra Thomas, James Tibbs, and Ishmail Sesay respectfully submit the following: (i) statement of the issues to be presented on appeal from the *Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues*, dated November 9, 2015 (ECF No. 13533, as corrected ECF No. 13534) (the “**Decision**”) and the *Judgment*, dated December 4, 2015 (ECF No. 13563) (the “**Judgment**”); and (ii) designation of the items to be included in the record on appeal.

I. Statement of the Issue to be Presented on Appeal

Appellants submit the following statement of issues to be presented on appeal:

1. Did the Bankruptcy Court err in holding that “[c]laims that allege that New GM is liable in connection with vehicle owners’ failure to file proofs of claim in the Old GM

bankruptcy case are barred and enjoined by the Sale Order, April Decision and June Judgment, and shall not be asserted against New GM” under Paragraph 24 of the Judgment?

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Appellants submit the following designation of items to be included in the record on appeal (including any exhibit, annex, or addendum thereto):

Item No.	Document	Filing Date	ECF No.
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8	Decision on Motion to Enforce Sale Order	4/15/2015	13109
9	Judgment	6/1/2015	13177

Dated: December 28, 2015

Respectfully submitted,

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